

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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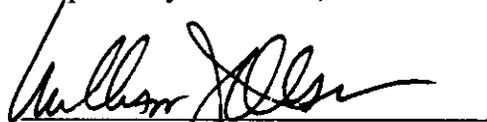
POSTAL RATE AND FEE CHANGES, 2001 )

POSTAL RATE COMMISSION  
Docket No. R2001-117

VAL-PAK DIRECT MARKETING SYSTEMS, INC.  
AND VAL-PAK DEALERS' ASSOCIATION, INC.  
FOURTH INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE  
WITNESS WILLIAM P. TAYMAN, JR. (VP/USPS-T6-14)  
(November 13, 2001)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Val-Pak Direct Marketing Systems, Inc. and Val-Pak Dealers' Association, Inc. hereby submit interrogatories and document production requests. If necessary, please redirect any interrogatory and/or request to a more appropriate Postal Service witness.

Respectfully submitted,



William J. Olson

John S. Miles

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Counsel for:

Val-Pak Direct Marketing Systems, Inc. and  
Val-Pak Dealers' Association, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.



William J. Olson

November 13, 2001

**VP/USPS-T6-14.**

Please refer to your response to VP/USPS-T6-3.

- a. In your response to part b of that interrogatory, you indicated that “employees who participate in this program do not receive the twice-per-year cost-of-living pay increases that our bargaining employees receive.” Is your statement intended to imply that over time the basic pay scale for the 83,000 non-bargaining career employees has not increased in line with (i) the rate of inflation, or (ii) the basic pay scale of clerks and mailhandlers? If this is not the case, what are you attempting to convey by your statement? Please explain fully.
- b. Is your statement quoted in preceding part a intended to imply that the EVA Pay for Performance program is treated as, and should be considered as, an annual “entitlement” designed to replace a cost-of-living increase? If this is not the case, what are you attempting to convey by your statement? Please explain fully.
- c. You also state in part b that the “non-bargaining career employees (over 83,000) ... do not receive any annual general increases as our bargaining employees receive or that other federal employees receive.” Are you saying that over the last, say, five years, none of the 83,000 non-bargaining career employees have received a general pay increase? Unless your answer is an unqualified affirmative, please provide your best estimate of the average pay increase over

the last five years for the 83,000 non-bargaining career employees who are eligible to participate in the EVA Pay for Performance program.

- d. You further state in part b that “over 30,000 of the covered employees forwent premium over time pay for work in excess of 8 hours in a day.”
- (i) Please explain fully what you intend by this statement.
  - (ii) Are the “30,000 covered employees who forwent premium over time” paid on a fixed salary basis or an hourly basis?
  - (iii) If they are hourly employees, is the Postal Service not required by law to pay overtime for work in excess of 8 hours a day?
- e. Please confirm that 83,000 times \$1,839.98 is equal to approximately \$152.7 million.
- f. Please confirm that \$200 million divided by 83,000 is approximately \$2,410.
- g. Please confirm that \$200 million divided by \$1,839.98 per employee is equal to approximately 108,700 employees.
- h. Please reconcile the computations in preceding parts e, f and g with your responses to other parts of the above-referenced interrogatory, especially parts c and d.